

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

LONNIE LOWERY,

Plaintiff

CIVIL NO. 3:07cv511

TRANS UNION, LLC., et al

Defendants

PLAINTIFF'S MEMORANDUM IN SUPPORT OF HIS MOTION  
FOR ENTRY OF DEFAULT JUDGMENT

COMES NOW the Plaintiff, by counsel, as and for his memorandum in support of his Motion for Entry of Default Judgment, states as follows:

This Plaintiff filed his complaint on August 22, 2007. As Defendant , GE Money Bank (“GE”) does not have a registered agent or any officer available for service within the Commonwealth of Virginia, Plaintiff accomplished service through Virginia’s Secretary of the Commonwealth. Service was returned to the Clerk of this Court on September 18, 2007. Accordingly, Defendant’s answer was due by or before October 9, 2007. As of November 30, 2007, Defendant has not filed an answer to the complaint.

The Plaintiff thus moves this Court for entry of default judgment pursuant to F.R.C.P. §55(b)(2). Plaintiff’s damages are unliquidated. Accordingly, the Plaintiff asks the Court to set a hearing at which Plaintiff may present evidence of his damages.

LONNIE LOWERY,

/s/

Leonard A. Bennett, Esq.  
VSB #37523  
Attorney for Plaintiff  
CONSUMER LITIGATION ASSOCIATES, P.C.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 10<sup>th</sup> day of December, 2007, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

**Mark Gregory Carlton**  
Harman Claytor Corrigan & Wellman  
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And I certify that I mailed a true copy of the foregoing document to the Defendant, GE Money Bank by certified mail on this 10<sup>th</sup> day of December at the last known address listed for service through Secretary of Commonwealth, P. O. Box 981064, El Paso, TX 79998-1064 and the additional address of P. O. Box 103065, Roswell, GA 30076.

/s/

Leonard A. Bennett, Esq.  
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Attorney for Plaintiff  
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